

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

100 BANK, LLC)	
Plaintiff,)	
)	
v.)	
)	
BTC MALL ASSOCIATES, LLC;)	
CITY OF BURLINGTON;)	
THE BURLINGTON DEVELOPMENT)	
REVIEW BOARD; CAITLIN HALPERT,)	
in her official capacity; BROOKS)	Docket No. 2:21-cv-154
McARTHUR, in his official capacity;)	
BRADFORD L. RABINOWITZ, in his)	
official capacity; HARRIS SPRINGER, in)	
his official capacity; SCOTT GUSTIN, in)	
his official capacity,)	
Defendants,)	
)	
and)	
)	
BRADLEY M. BIGGIE, in his official)	
capacity; KIM IANELLI, in her official)	
capacity,)	
Relief Defendants.)	

THE PARTIES' STIPULATED MOTION TO STAY

Plaintiff 100 Bank, LLC and Defendant BTC Mall Associates, LLC¹ jointly request that the Court stay and hold this case in abeyance to allow the Parties time to formalize a settlement of the matter, and continue all outstanding deadlines during the stay. The Parties submit the attached, proposed Order staying and holding this case in abeyance, in which they propose that the Court schedule a status conference to discuss the status of the case and a process for resuming the litigation if the matter is not resolved within 30 days.

¹ 100 Bank and the City Defendants have stipulated to dismissal of the claims against the City Defendants with prejudice.

Dated at Burlington, Vermont, this 14th day of July 2021.

DUNKIEL SAUNDERS ELLIOTT RAUBVOGEL
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By: _____

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Attorneys for BTC Mall Associates, LLC

Dated at Burlington, Vermont this 14th day of July 2021

/s/Matthew B. Byrne _____

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For Plaintiff, 100 Bank LLC